

EXHIBIT A

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of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF GREGORY A.
BRAY IN SUPPORT OF THE
EMERGENCY MOTION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO
EXPEDITE CONSIDERATION OF
MOTION FOR LEAVE TO FILE
SUR-REPLY**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

1 I, Gregory A. Bray, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am an attorney admitted to practice in the State of California and I am a partner
5 in the Financial Restructuring Group of Milbank LLP ("Milbank"), counsel to the Official
6 Committee of Unsecured Creditors (the "Creditors' Committee") of the above-captioned debtors
7 in possession (collectively, the "Debtors"). Milbank maintains an office at, among other places,
8 2029 Century Park East, 33rd Floor, Los Angeles, California, 90067-3019. There are no
9 disciplinary proceedings pending against me.

10 2. I am duly authorized to make this declaration on behalf of Milbank in support of
11 the *Emergency Motion of the Official Committee of Unsecured Creditors to Expedite*
12 *Consideration of Motion for Leave to File Sur-Reply* (the "Motion to Expedite"), filed in
13 connection with the *Official Committee of Unsecured Creditors' Motion for Leave to File Sur-*
14 *Reply* (the "Motion for Leave"). The facts set forth in this declaration are based upon my personal
15 knowledge, my review of relevant documents, or information provided to me by other advisors to
16 the Creditors' Committee, including other attorneys at Milbank. If called upon to testify, I would
17 testify competently to the facts set forth in this declaration.

18 3. In the Motion for Leave, the Creditors' Committee seeks leave to file the *Official*
19 *Committee of Unsecured Creditors' Supplemental Brief in Support of its Limited Objection to Plan*
20 *Confirmation* (the "Sur-Reply") in response to the *Plan Proponents' Joint Memorandum of Law*
21 *and Omnibus Response in Support of Confirmation of Debtors' and Shareholder Proponents' Joint*
22 *Chapter 11 Plan of Reorganization* [Docket No. 7528].

23 4. The Court's expedited consideration of the Motion for Leave is necessary due to
24 the fact that confirmation hearings regarding the Debtors' Plan¹ are currently underway. The
25 Creditors' Committee believes additional briefing on the Debtors' newly-raised arguments
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27 ¹ Capitalized terms not defined herein have the meanings ascribed to them in the *Debtors' and Shareholder*
28 *Proponents' Joint Chapter 11 Plan of Reorganization Dated May 22, 2020* [Docket No. 7521] (as it may be
amended, modified or supplemented from time to time, and together with any exhibits or schedules thereto, the
"Plan").

1 regarding the application of 11 U.S.C. § 502(e) to contingent claims for indemnification against
2 the Debtors, introduced on reply, will be useful to the Court in evaluating the Plan.

3 5. There have been no previous time modifications related to this request, whether by
4 stipulation or Court order.

5 6. This request for expedited consideration is unlikely to cause any significant delay
6 in the above-captioned chapter 11 cases or the ongoing confirmation proceedings. The Creditors'
7 Committee does not seek a hearing in connection with this request.

8 7. Via e-mail, counsel to the Creditors' Committee notified counsel to the Debtors and
9 the Official Committee of Tort Claimants on Monday, June 1, of the Creditors' Committee's intent
10 to file the Motion for Leave and the Motion to Expedite. Debtors' counsel responded that the
11 Debtors intend to oppose both the Motion for Leave and Motion to Expedite.

12 I declare under penalty of perjury that the foregoing is true and correct to the best of my
13 knowledge and belief.

14 Executed on June 1, 2020, Los Angeles, CA

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16 /s/ Gregory A. Bray
17 Gregory A. Bray
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